

REMARKS

The present application was filed on October 12, 2001 with claims 1-27. Claims 1, 14 and 27 are the independent claims.

In the outstanding Office Action, the Examiner: (i) rejected claims 1-9, 11 and 13-27 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,697,791 to Hellerstein et al. (hereinafter “Hellerstein”); and (ii) rejected claims 10 and 12 under 35 U.S.C. §103(a) as being unpatentable over Hellerstein in view of U.S. Patent No. 6,493,723 to Busche (hereinafter “Busche”).

In this response, Applicants: (i) amend independent claims 1, 14 and 27; and (ii) traverse the §102(e) and §103(a) rejections for at least the following reasons.

Regarding the §102(e) rejection of claims 1-9, 11 and 13-27, Applicants assert that Hellerstein does not disclose each and every limitation of the claimed invention. For example, as recited in amended independent claim 1, a computer-based method for use in accordance with an event management system comprising the steps of automatically generating one or more event relationship networks from event data, wherein an event relationship network comprises a graphical representation wherein nodes represent events and links connect correlated nodes, and utilizing the one or more generated event relationship networks to construct one or more correlation rules for use by a correlation engine in the event management system. Amended independent claims 14 and 27 recite similar limitations.

While Applicants believe that independent claims 1, 14 and 27, as originally filed, are patentably distinguishable over Hellerstein, Applicants have nonetheless amended the independent claims to further clarify the subject matter of the invention so as to expedite the present application through to issuance. More particularly, as recited above, Applicants have amended independent claims 1, 14 and 27 to indicate that an event relationship network comprises a graphical representation wherein nodes represent events and links connect correlated nodes.

Support for the amendment may be found throughout the present specification, by way of example, see page 7, line 6-10, where it is illustratively explained that the approach taken by the present invention to describe correlation logic uses a conceptual framework called event relationship networks or ERNs. In one embodiment, an ERN is a directed cyclic graph. Nodes are events and are labeled with the role of the event within the case. Arcs or links from one event to the next

indicate that the latter is associated with or correlated with the former. Furthermore, as the Abstract of the present application states, in conventional approaches, ERNs are constructed purely based on human expertise and there is no automatic or event semi-automatic method that validates or completes ERNs. The present invention provides techniques for automatically validating and completing existing ERNs and/or constructing new ERNs, based on collected event data.

Hellerstein does not disclose automatically generating one or more event relationship networks from event data, wherein an event relationship network comprises a graphical representation wherein nodes represent events and links connect correlated nodes, as in the claimed invention.

The Office Action cites column 5, lines 16-30, of Hellerstein and “computing devices” and “connections” referred to therein in support of rejecting the “nodes” and “links” recited in the claimed invention. However, Hellerstein does not disclose an event relationship network comprising a graphical representation and, therefore, also does not disclose nodes of the graphical representation representing events and links of the graphical representation connecting correlated nodes. The “computing devices” and “connections” in Hellerstein are actual computing devices and connections and not nodes and links of a graphical representation.

For at least the above reasons, independent claims 1, 14 and 27 are patentable over Hellerstein. Further, dependent claims 2-9, 11, 13 and 15-26 are also patentable over Hellerstein not only for the above reasons, but also because such claims recite patentable subject matter in their own right.

Regarding the §103(a) rejection of claims 10 and 12, Applicants assert that such claims are patentable over Hellerstein not only for the above reasons, but also because such claims recite patentable subject matter in their own right. Busche does not remedy any of the above deficiencies of Hellerstein.

Further, Applicants assert that Hellerstein and Busche are not properly combinable at least because the two references are technologically unrelated and one skilled in the art of either one of the references would not look to the other of references for teachings. Hellerstein relates to event management and Busche relates to data mining associated with transportation products.

Also, since the present application is commonly assigned to the assignee of the Busche reference, i.e., International Business Machines Corporation, and Busche is a § 102(e) reference used in a § 103(a) rejection, the use of Busche is improper under § 103(c). The same is true of the use of Hellerstein in a § 103(a) rejection.

In view of the above, Applicants believe that claims 1-27 are in condition for allowance, and respectfully request withdrawal of the § 102(e) and § 103(a) rejections.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Wayne L. Ellenbogen", with a stylized flourish extending from the end.

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